CM[A]

CHEMICAL MANUFACTURERS ASSOCIATION

March 20, 1998

COURTNEY M. PRICE
VICE PRESIDENT
CHEMSTAR

Via Fax & Express Mail

Dr. C.W. Jameson
National Toxicology Program
Report on Carcinogens
MD EC-14
P. O. Box 12233
Research Triangle Park, North Carolina 27709

      Re: **Ninth NTP Report on Carcinogens (Nickel and Nickel Compounds)**

Dear Dr. Jameson:

      The Metal Catalysts Panel (Panel) of the Chemical Manufacturers Association (CMA) submits these comments on the National Toxicology Program's (NTP) review of "Nickel Refining" and "Nickel and Nickel Compounds" for possible listing in the Ninth Biennial Report on Carcinogens. 63 Fed. Reg. 5565 (Feb. 3, 1998). Panel members manufacture metal-bearing catalysts, including those containing nickel, use such catalysts in their manufacturing processes, or reprocess used metal catalysts.[1] The Panel seeks to ensure that toxicity classifications and other regulatory decisions relating to metal catalysts are based on sound science.

      The Panel supports and adopts the comments submitted by the Nickel Development Institute (NiDi), the Nickel Producers Environmental Research Association (NiPERA), and Inco United States, Inc. (Inco). As discussed in those comments, NTP should not include "Nickel Refining" or "Nickel and Nickel Compounds" on the Biennial Report and, in making classifications for listing purposes, should expressly acknowledge the role of specific nickel species in determining the potential carcinogenicity of nickel and its compounds.

      Please direct any questions concerning these comments to Ms. Elizabeth Festa Watson, Manager of the Metal Catalysts Panel, at (703) 741-5629.

                      Sincerely yours,

                      Courtney Price/

cc: National Toxicolgy Program (NTP)
       Nickel Development Institute (NiDi)
       Inco United States, Inc. (Inco)

---

[1] Panel members are: Akzo Nobel Chemicals Inc., CRI International, Inc., Criterion Catalyst Co., LP, Crosfield Catalysts, Engelhard Corporation, Gulf Chemical & Metallurgical, Haldor Topsoe, Inc., OM Group, Inc., United Catalysts Inc., UOP and W.R. Grace & Co.